

July 1, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Request for Further Extension of Special Temporary Authority for
Galaxy 15, Call Sign S2387

Dear Ms. Dortch:

PanAmSat Licensee Corp. (“PanAmSat”), pursuant to Section 25.210 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ herein requests an additional day, from June 30, 2010 through July 1, 2010, of the Special Temporary Authority (“STA”)² previously granted Intelsat to operate the Galaxy 15 satellite’s (call sign S2387) C-band communications payload (3700-4200 MHz and 5925-6425 MHz) outside of the +/- 0.05° East/West station-keeping box pursuant to a waiver of Section 25.210(j) of the Commission’s rules.³

As PanAmSat previously has informed the International Bureau (“Bureau”), on April 5, 2010, the Galaxy 15 satellite suffered an anomaly of unknown origin. Due to this anomaly, the satellite has drifted outside of its authorized +/- 0.05° East/West station-keeping box pursuant to STA.⁴ During the time period

¹ 47 C.F.R. § 25.210.

² Intelsat has filed this STA request, an FCC Form 159 and a filing fee electronically via the International Bureau’s Filing System. This request for STA is related to a verbal grant of STA provided by the FCC on June 30, 2010, for operations through July 3, 2010. Intelsat ceased the G15 tests using the KA275 earth station at 11:15utc (7:15am EST) on July 1, 2010 and thus the requested authorization period is shorter than the originally anticipated.

³ 47 C.F.R. § 25.210(j). *See Policy Branch Information; Actions Taken*, Report No. SAT-00702, File No. SAT-STA-20100616-00138 (June 25, 2010) (Public Notice).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (Apr. 16, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (Jun. 11, 2010) (Public Notice).

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covered by this STA request, Galaxy 15 will be located between 128.43° W.L. and 128.33° W.L.

PanAmSat will utilize the transmissions contemplated herein in a further attempt to disable the communications payload on the Galaxy 15 satellite. PanAmSat's sister company, Intelsat North America LLC, is filing an STA extension request to continue to utilize an earth station in Clarksburg, Maryland (call sign KA275) to transmit to the satellite for purpose of this disabling effort. In the course of these transmissions, the Galaxy 15 transponders will operate at saturation, resulting in each of the 10 MHz carriers having at beam peak a downlink EIRP of approximately 41 dBW.

Grant of this STA request is in the public interest. The Commission may grant waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁷ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists in this case based on hardship. Due to the technical anomaly on the Galaxy 15 satellite, PanAmSat is unable to comply with the requirements of Section 25.210(j) of the Commission's rules. PanAmSat will, however, take all practicable steps to coordinate the safe operation of Galaxy 15. Moreover, grant of this STA request will allow PanAmSat to make a further attempt to disable the communications payload on the Galaxy 15 satellite. If this attempt to disable the communications payload is successful, it will greatly reduce the likelihood of Galaxy 15 causing potential interference into the operations of other operators, thereby promoting the public interest.

⁵ 47 C.F.R. § 1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular* 897 F.2d at 1166.

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PanAmSat agrees to the following conditions, each of which was included in PanAmSat's prior grant of special temporary authority to attempt to disable the Galaxy 15 satellite's communications payload.⁸

1. PanAmSat is required to accept interference from other lawfully operating space stations or radio communications systems.

2. In the event of any harmful interference to other lawfully operating space stations or radio communications systems, PanAmSat shall inform the Commission, in writing, immediately of such an event.

3. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at PanAmSat's own risk.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

/s/ Jennifer D. Hindin

Counsel to Intelsat
Wiley Rein LLP

On behalf of:

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall

⁸ *PanAmSat Licensee Corp. Request for Special Temporary Authority for Galaxy 15*, File No. SAT-STA-20100616-00138 (stamp grant with conditions June 21, 2010).